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Attorney for Plaintiff, ABRAM RODRIGUEZ

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

**ABRAM RODRIGUEZ,**

Plaintiff,

v.

**INTERNATIONAL LONGSHORE  
AND WAREHOUSE UNION LOCAL  
29; INTERNATIONAL  
LONGSHORE AND WAREHOUSE  
UNION,**

Defendants.

Case No. 08-CV-0433-H-BLM

**STIPULATION TO VACATE  
AND RESCHDULE EARLY  
NEUTRAL CASE EVALUATION  
CONFERENCE AND RELATED  
DEADLINES; ORDER**

**Complaint Filed: March 7, 2008**

WHEREAS plaintiff ABRAM RODRIGUEZ intends to amend the  
complaint filed against defendants INTERNATIONAL LONGSHORE AND  
WAREHOUSE UNION LOCAL 29 and INTERNATIONAL LONGSHORE AND  
WAREHOUSE UNION to allege employment and labor violations which plaintiff  
believes he was subjected to since the filing of the complaint in this matter but the  
parties have been unable to confer on the matter for the reasons listed below;

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1 WHEREAS counsel for the parties have been limited in their ability to  
2 coordinate case-related matters, including the filing of an amended complaint, due  
3 to negotiations between counsel for the ILWU on a new collective bargaining  
4 agreement between the union and various employer signatories to it for which a  
5 tentative contract was reached on July 29, 2008, after several weeks of round-the  
6 clock negotiations;

7 WHEREAS it was discussed between counsel that the amendment of the  
8 complaint would make it currently impractical to adequately identify, among other  
9 things, the bases of plaintiff's claims and defendants' defenses, potential witnesses,  
10 a proposed discovery plan, expert disclosures, a motion schedule, and potential  
11 settlement until the amended complaint is filed;

12 WHEREAS since defendants do not yet know the particulars of the proposed  
13 amended complaint, defendants reserve the right to oppose its filing;

14 WHEREAS counsel for plaintiff will also be unavailable for the currently  
15 scheduled Early Neutral Evaluation currently scheduled for August 11, 2008, due  
16 to a previously scheduled family vacation with his parents and siblings;

17 IT IS HEREBY STIPULATED BY ALL OF THE PARTIES TO THE  
18 WITHIN ACTION that good cause exists to vacate the Early Neutral Evaluation  
19 conference and related deadlines and reschedule the Early Neutral Evaluation  
20 conference and related deadlines in approximately 60 days.

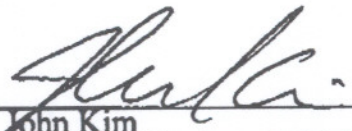
21 DATED: July 30, 2008

DEREK T. ANDERSON, ATTORNEY AT  
LAW

22  
23 By   
24 Derek T. Anderson  
Attorney for Plaintiff, ABRAM RODRIGUEZ  
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1 DATED: July 31, 2008

HOLGUIN, GARFIELD & MARTINEZ

2  
3 By 

4 Attorneys for Defendant, INTERNATIONAL  
5 LONGSHORE & WAREHOUSE UNION  
LOCAL 29

6 DATED: July 31, 2008

LEONARD CARDER, LLP

7  
8 By 

9 Robert S. Remar  
10 Attorneys for Defendant, INTERNATIONAL  
11 LONGSHORE & WAREHOUSE UNION

12 ORDER

13 IT IS HEREBY ORDERED that the Early Neutral Evaluation conference in  
14 this action currently scheduled for August 11, 2008 and related deadlines are  
15 vacated and will be rescheduled in approximately 60 days.

16  
17 DATED: \_\_\_\_\_

18 UNITED STATES DISTRICT JUDGE  
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